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July 10, 2025

## VIA ECF Filing:

Hon. Kenneth M. Karas The Hon. Charles L. Brieant, Jr. Federal Building and U.S. Courthouse 300 Quarropas Street White Plains, NY 10601

> Re: Shaffer v. Kavarnos Docket No.: 7:23-cv-10059-KMK

Letter Motion for Extension of Time to Submit Post Trial Memorandum

Dear Judge Karas:

I write to request an extension of time to file post-trial memorandum in the above-referenced matter. At the close of trial on July 7<sup>th</sup>, Your Honor gave the parties until Friday, July 11<sup>th</sup>, to submit post trial memorandum of law.

In an inconvenient matter of timing, I must submit to a random trust account records audit tomorrow, July 11<sup>th</sup>, by the New Jersey State Bar. I cannot postpone as I already sought an accommodation to attend trial in this matter on July 7<sup>th</sup>. The simultaneous obligations are in conflict and more time is needed to thoroughly present Defendant's final arguments.

Plaintiff's counsel, Jonathan LA Phillips, Esq. refused consent fearing Your Honor wanted to consider the submissions over the weekend and hold argument early next week. Despite Mr. Phillips objection, the circumstances warrant a short extension until Monday, July 14th, for the parties to submit their post-trial memorandum.

With no previous extensions of this deadline. I respectfully request an extension until Monday, July 14th, for the parties to submit their post-trial memorandum. Thank you for considering this matter.

Granted.

CC: Jonathan LA Phillips, Esq.

Respectfully,
/s/ Mark Matri
Mark T. Matri, Esq.

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